

# EXHIBIT “D”

**From:** [Gonzales, John P.](#)  
**To:** [Matt Capacete](#); [Charles Albright](#); [office user](#)  
**Cc:** [Hatchett, Jahlee J.](#); [James Goslee](#); [Daniel Savage](#)  
**Subject:** RE: Nicholas Barone v. Tracey L. Gordon, et al., Case No.: 2:23-cv-02821  
**Date:** Monday, June 30, 2025 3:20:46 PM  
**Attachments:** [image001.png](#)  
[image005.png](#)  
[image006.png](#)

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I have followed up again with the City to get this information and will provide it to you when received. JPG



**John P. Gonzales**

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**From:** Matt Capacete <[mcapacete@cpirlaw.com](mailto:mcapacete@cpirlaw.com)>  
**Sent:** Monday, June 30, 2025 2:39 PM  
**To:** Gonzales, John P. <[JPGonzales@MDWCG.com](mailto:JPGonzales@MDWCG.com)>; Charles Albright <[calbright@cpirlaw.com](mailto:calbright@cpirlaw.com)>; office user <[office@brservices.com](mailto:office@brservices.com)>  
**Cc:** Hatchett, Jahlee J. <[JJHatchett@MDWCG.com](mailto:JJHatchett@MDWCG.com)>; James Goslee <[JGoslee@cpirlaw.com](mailto:JGoslee@cpirlaw.com)>; Daniel Savage <[dsavage@savage-law.com](mailto:dsavage@savage-law.com)>  
**Subject:** RE: Nicholas Barone v. Tracey L. Gordon, et al., Case No.: 2:23-cv-02821

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Good Afternoon John,

Please find attached Judge Goldberg's 6/27/25 Order regarding our Motion to Compel – filed December 2, 2024. We still have not received the materials from you related to Nick's pension fund and employment file that were the subject of that motion. Please produce them by July 11, 2025 to avoid further motions.

Matt

Matthew A. Capacete, Esquire



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